

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re

CENTER CITY HEALTHCARE, LLC d/b/a  
HAHNEMANN UNIVERSITY HOSPITAL, *et al.*,<sup>1</sup>

Debtors.

CENTER CITY HEALTHCARE, LLC, d/b/a  
HAHNEMANN UNIVERSITY HOSPITAL,  
ST. CHRISTOPHER'S HEALTHCARE, LLC,  
TPS V OF PA, LLC, and SCHC PEDIATRIC  
ASSOCIATES, LLC,

Plaintiffs,

v.

DE LAGE LANDEN FINANCIAL SERVICES, INC.,

Defendant.

Chapter 11

Case No. 19-11466 (MFW)

(Jointly Administered)

Adv. No. 21-50896 (MFW)

**STIPULATION EXTENDING PRE-TRIAL DATES AND DEADLINES**

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs Center City Healthcare, LLC d/b/a Hahnemann University Hospital, St. Christopher's Healthcare, LLC, TPS V of PA, LLC, and SCHC Pediatric Associates, LLC ("Plaintiffs") and Defendant De Lage Landen Financial Services, Inc. ("Defendant"), by and through their undersigned counsel, that the following dates and deadlines set forth in the *Order Establishing Streamlined Procedures Governing Adversary Proceedings Brought by Debtors Pursuant to Sections 502, 547, 548 and*

<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: Center City Healthcare, LLC (3341), Philadelphia Academic Health System, LLC (8681), St. Christopher's Healthcare, LLC (8395), Philadelphia Academic Medical Associates, LLC (8165), HPS of PA, L.L.C. (1617), SCHC Pediatric Associates, L.L.C. (0527), St. Christopher's Pediatric Urgent Care Center, L.L.C. (6447), SCHC Pediatric Anesthesia Associates, L.L.C. (2326), StChris Care at Northeast Pediatrics, L.L.C. (4056), TPS of PA, L.L.C. (4862), TPS II of PA, L.L.C. (5534), TPS III of PA, L.L.C. (5536), TPS IV of PA, L.L.C. (5537), and TPS V of PA, L.L.C. (5540). The Debtors' mailing address is 216 North Broad Street, 4th Floor, Philadelphia, Pennsylvania 19102.

*550 of the Bankruptcy Code* entered by the Court on September 21, 2021 [Docket No. 10] shall be extended as follows:

<u>Description</u>	<u>Original Deadline</u>	<u>New Deadline</u>
Last day for all non-expert fact discovery including depositions of fact witnesses	May 31, 2022	June 30, 2022
Disclosures and reports of (a) the parties for any issue on which they bear the burden of proof (not including any report by Plaintiffs on insolvency) and (b) if Defendant intends to provide expert testimony regarding insolvency of the Debtors due.	June 30, 2022	August 1, 2022
Disclosures and reports (a) of the parties' rebuttal experts, and (b) Plaintiffs' report on the insolvency of the Debtors, if any, due	July 31, 2022	August 31, 2022
All expert discovery due including depositions	September 30, 2022	October 31, 2022
Last day to file and serve dispositive motions	October 31, 2022	November 30, 2022

[Signature page to follow]

**SAUL EWING ARNSTEIN & LEHR LLP**

*/s/ John D. Demmy* \_\_\_\_\_

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**OFFIT KURMAN**

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